

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

RUMBLE, INC.;)	
RUMBLE USA INC.; and)	
RUMBLE CANADA INC.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Action No. 7:24-cv-00115-B
)	
WORLD FEDERATION OF)	
ADVERTISERS; DIAGEO PLC;)	
WPP PLC; and GROUPM)	
WORLDWIDE, INC.,)	
)	
<i>Defendants.</i>)	

**JOINT MOTION TO EXTEND TIME TO ANSWER
OR OTHERWISE RESPOND AND TO ESTABLISH BRIEFING SCHEDULE**

Plaintiffs Rumble, Inc., Rumble USA Inc., and Rumble Canada Inc. ("Plaintiffs") and Defendants WPP PLC ("WPP"), GroupM Worldwide, Inc. ("GroupM"), Diageo PLC ("Diageo"), and World Federation of Advertisers ("WFA")¹ respectfully request that the Court extend the deadline for Defendants to answer or otherwise respond to the amended complaint to and through **February 7, 2025**—an extension of 30 days to the current deadline. The Parties also request the entry of a briefing schedule for any timely filed Rule 12(b) motions as follows: **April 4, 2025** will be the deadline for Plaintiffs to file

¹ WPP, GroupM, Diageo, and WFA are collectively referred to herein as "Defendants," and Defendants and Plaintiffs are collectively referred to herein as the "Parties."

any responses to any Rule 12(b) motions; and **May 20, 2025** will be the deadline for Defendants to file any replies in support of the Rule 12(b) motions.

In support of this motion, the parties state as follows:

PROCEDURAL BACKGROUND

1. On August 6, 2024, Plaintiffs filed their original complaint in this case (the “Rumble Case”). The three, original Defendants’ answer/response deadlines to the complaint were as follows: GroupM’s deadline was November 5, 2024 (Dkt. 20); WPP’s deadline was December 5, 2024 (Dkt. 21); and WFA’s deadline was December 13, 2024 (Dkt. 15).

2. On September 20, 2024, Plaintiffs amended their complaint in this case to, among other things, sue Diageo. Dkt. 13. Diageo’s original answer/response deadline was November 21, 2024. Dkt. 22.

3. In an effort to coordinate motions and briefing, Defendants (other than Diageo) filed an unopposed motion to extend the answer/response deadline to January 8, 2025. Dkt. 24. The Court granted that extension for those three Defendants. Dkt. 25. Shortly thereafter, Diageo sought the same extension, to which Plaintiffs were also unopposed, and the Court granted that extension. Dkt. 27, 29.

REQUESTED RELIEF

4. The Parties jointly request the following deadlines:

- a. **February 7, 2025** – Defendants’ deadline to answer or otherwise respond to Plaintiff’s First Amended Complaint.

b. **April 4, 2025** – Plaintiffs’ deadline to respond to any Rule 12(b) motions filed by Defendants.

c. **May 30, 2025** – Defendants’ deadline to file any reply briefs in support of any Rule 12(b) motions.

5. Good cause exists to extend the answer/response deadline and establish the requested briefing schedule. *See* FED. R. CIV. P. 6(b)(1)(A).

6. Given the complex nature of this antitrust suit, and the need for the foreign-based Defendants (WPP, Diageo, and WFA) to coordinate with their U.S.-based counsel, a short, 30-day extension is well justified. Moreover, Defendants intend to file consolidated briefing to promote judicial efficiency by presenting any issues for decision concisely and efficiently to this Court in as few filings as possible. A 30-day extension will facilitate that effort among Defendants. The extension also allows Defendants to avoid intensive briefing efforts during the holiday season.

7. The requested briefing schedule separately establishes realistic deadlines for responses and replies, such that the Parties and the Court have certainty regarding the Rule 12(b)-briefing process.²

² This requested extension and briefing schedule would also substantially match the recently amended answer/response deadline and briefing schedule in the related case pending before this Court, *X Corp. v. World Federation of Advertisers*, 7:24-CV-00114-B. Until the recent extension in the X case, entered on December 5, 2024, the case brought by X Corp. had an answer/response deadline approximately a month before this case’s answer/response deadline. The relief requested herein would ensure that World Federation of Advertisers, which is a defendant in both cases, can appropriately prepare and coordinate its briefing in both cases.

Accordingly, the Parties respectfully request that this Court grant this motion, extend Defendants' time to answer or otherwise respond to Plaintiffs' amended complaint to February 7, 2025, and establish the briefing schedule for any Rule 12(b) motions as set forth above.

Respectfully submitted.

/s/ John C. Sullivan

John C. Sullivan
Texas Bar No. 24083920
john.sullivan@the-sl-lawfirm.com
Jace R. Yarbrough
Texas Bar No. 24110560
jace.yarbrough@the-sl-lawfirm.com
SIL LAW PLLC
610 Uptown Blvd., Suite 2000
Cedar Hill, TX 75104
Telephone: (469) 523-1351
Facsimile: (469) 613-0891

Mark Meador*
mark@kressinmeador.com
Brandon Kressin*
brandon@kressinmeador.com
Christian Lorenz**
christian@kressinmeador.com
Patrick Greco**
patrick@kressinmeador.com
KRESSIN MEADOR POWERS LLC
300 New Jersey Ave., Suite 900
Washington, DC 20001
Telephone: (202) 464-2905

*Admitted *pro hac vice*

**Admission *pro hac vice* pending

*Attorneys for Plaintiffs Rumble Inc.,
Rumble USA Inc., and Rumble Canada
Inc.*

/s/ Andrew B. Ryan

Andrew B. Ryan
Texas Bar No. 24054464
Ryan Law Partners LLP
3811 Turtle Creek Blvd.
Suite 1450
Dallas, TX 75219
(214) 347-7360
andy@ryanlawpartners.com

Steven P. Lehotsky*
LEHOTSKY KELLER COHN LLP
200 Massachusetts Avenue, NW
Washington, DC 20001
(512) 693-8350
steve@lkcfirm.com

Andrew B. Davis**
Texas Bar No. 24082898
LEHOTSKY KELLER COHN LLP
408 W. 11st Street, 5th Floor
Austin, TX 78701
(512) 693-8350
andrew@lkcfirm.com

Drew F. Waldbeser*
LEHOTSKY KELLER COHN LLP
3280 Peachtree Road NE
Atlanta, GA 30305
(512) 693-8350
drew@lkcfirm.com

* *Pro hac vice* motion forthcoming

**Admitted *pro hac vice*

*Counsel for Defendant WPP PLC and
GroupM Worldwide, Inc.*

/s/ D. Bruce Hoffman

D. Bruce Hoffman*

Jacob M. Coate*

Cleary Gottlieb Steen & Hamilton LLP

2112 Pennsylvania Avenue, NW

Washington, DC 20037

Telephone: (202) 974-1500

bhoffman@cgsh.com

jcoate@cgsh.com

Catherine L. Guerrier*

Cleary Gottlieb Steen & Hamilton LLP

One Liberty Plaza, 1 Liberty Pl

New York, NY 10006

Telephone: (212) 225-2138

cguerrier@cgsh.com

Amber M. Rogers

Hunton Andrews Kurth

1445 Ross Ave. #3700

Dallas, TX 75202

Telephone: (214) 468-3308

arogers@HuntonAK.com

Counsel for Defendant Diageo, plc

*Admitted *pro hac vice*

/s/ David C. Miller

David C. Miller

Texas Bar No. 24110114

William S. Snyder

Texas Bar No. 00786250

Samuel T. Acker

Texas Bar No. 24100111

BRADLEY ARANT BOULT CUMMINGS LLP

1445 Ross Avenue, Suite 3600

Dallas, TX 75202

Telephone: (214) 257-9800

Facsimile: (214) 939-8787

dmiller@bradley.com

wsnyder@bradley.com

sacker@bradley.com

Charles E. Elder (*pro hac vice*)

Tennessee Bar No. 038250

BRADLEY ARANT BOULT CUMMINGS LLP

1221 Broadway, Suite 2400

Nashville, TN 37203

Telephone: (615) 252-3597

Facsimile: (615) 252-6380

celder@bradley.com

*Counsel for Defendant World Federation of
Advertisers*

CERTIFICATE OF SERVICE

I certify that on December 20, 2024, the foregoing document was filed using the Court's CM/ECF system, which constitutes service to all attorneys of record who have registered for CM/ECF updates.

/s/ David C. Miller
David C. Miller